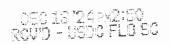
Joshua Jordan, pro se 3223 Twin Church Rd. Timmonsville, SC 29161 joshlegalstuff@gmail.com



IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF SOUTH CAROLINA (FLORENCE DIVISION)

JOSHUA JORDAN, individually and as assignee of Prehired, LLC, Plaintiff,

V.

JEFFREY BERNSTEIN, individually,
STRATEGIC EDUCATION LOAN FUND, LLC,
and
ISA PLUS, LLC,
Defendants.

Case No.: 4:24-cv-05775-JD-TER

SECOND MOTION FOR ALTERNATIVE SERVICE AND MEMORANDUM IN SUPPORT

Plaintiff Joshua K. Jordan ("Jordan"), proceeding pro se, hereby moves this Court for a second time pursuant to Federal Rule of Civil Procedure 4(e)(1) for an order permitting alternative service upon Defendants. In support of this Motion, Jordan states as follows:

- On October 31, 2024, Plaintiff filed his initial Motion for Alternative Service, documenting multiple unsuccessful attempts at personal service at Defendants' registered address of 6610 Lavandula Court, San Diego, California 92130 (See Prior Motion and Exhibits A-C attached thereto).
- 2. Since filing the initial motion, Plaintiff has made additional attempts to serve Defendants through certified mail, further demonstrating Defendants' apparent efforts to evade service.
- On November 14, 2024, Plaintiff sent service documents via USPS Certified Mail with Return Receipt Electronic (Tracking Number: 9589 0710 5270 1311 8617 83) to Defendants' registered address. (See Exhibit 1: Certified Mail Receipt)
- 4. Despite multiple delivery attempts over several weeks, service remained unsuccessful:

- November 16, 2024, at 2:03 PM (Notice Left No Authorized Recipient Available)
- November 18, 2024 (Redelivery Scheduled)
- November 27, 2024, at 3:20 PM (Notice Left No Authorized Recipient Available)

(See Exhibit 2: Electronic Return Receipt showing undeliverable status; Exhibit 3: USPS Tracking History)

- 5. These additional unsuccessful attempts at service further demonstrate that Defendants are deliberately evading service while maintaining 6610 Lavandula Court as their official registered address for service of process with the California Secretary of State, and the personal home address for Defendant Bernstein.
- 6. As noted in the prior motion, Attorney Andrew Nagurney currently represents Defendants ISAP and Bernstein in related litigation in the Southern District of California (Case No.: 3:22-cv-01211-JAH-JLB), and has previously accepted service via email in that matter.
- 7. All facts and arguments presented in Plaintiff's initial Motion for Alternative Service are incorporated herein by reference.

WHEREFORE, given these additional failed attempts at service and the continued pattern of service evasion by Defendants, Plaintiff respectfully renews his request that this Court grant permission for alternative service through one or more of the following methods:

- 1. Service by email to Attorney Andrew Nagurney at Nagurney@tbmlawyers.com;
- 2. Service by certified mail to Attorney Nagurney at:

Thorsnes Bartolotta McGuire LLP

2550 5th Avenue, 11th Floor

San Diego, California 92103

3. Service by publication in a newspaper of general circulation in San Diego County, California.

Given the demonstrated pattern of service evasion and Attorney Nagurney's current representation of Defendants in related federal litigation, Plaintiff submits that service through Attorney Nagurney would be the most efficient and effective means of ensuring actual notice to Defendants.

Respectfully submitted on December 13, 2024.

By: /s/ Joshua Jordan Joshua Jordan, pro se

3223 Twin Church Rd. Timmonsville, SC 29161 joshlegalstuff@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on December 13, 2024 a true and correct copy of this document is being served via the CM/ECF federal courts electronic portal to the names and addresses provided by the parties.

By: /s/ Joshua Jordan

Joshua Jordan, Pro Se.